

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**JOHN J. WOODS, ET AL.,**

**Defendants,**

Civil Action No.  
1:21-cv-3413-SDG

**FIFTH APPLICATION FOR COMPENSATION TO  
STRETTO, INC. AS CONSULTANT FOR THE RECEIVER**

A. Cotten Wright, the duly-appointed receiver (the “Receiver”) for Horizon Private Equity, III, LLC (“Horizon”) and certain assets of John J. Woods (“Woods”) in the above-captioned civil action (this “Case”), hereby submits this *Fifth Application for Compensation for Stretto, Inc. as Consultant for the Receiver*, for the period of July 1, 2022 through September 30, 2022 (the “Application Period”), and respectfully represents as follows:

1. On August 20, 2021, the U.S. Securities and Exchange Commission (the “Plaintiff”) filed a *Complaint* (Doc. No. 1) against Woods, Horizon, and Livingston Group Asset Management Company alleging violations of the

Securities Act of 1933, the Securities and Exchange Act of 1934, the Investment Advisers Act of 1940, and various regulations promulgated thereunder, thereby initiating this Case. On September 1, 2021, the Court entered its *Order Appointing Receiver* (the “Receivership Order”) appointing the Receiver to perform certain duties as set forth in that Order.<sup>1</sup> (Doc. No. 26).

2. Pursuant to the Receivership Order, the Receiver is authorized to retain professionals, including consultants, to assist in carrying out her duties as Receiver. Receivership Order, ¶ 7F.

The Receivership Order provides that the Receiver and her professionals:

are entitled to reasonable compensation and expense reimbursement from the Receivership Defendants as described in the “Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission” (the ‘Billing Instructions’) agreed to by the Receiver. Such compensation shall require the prior approval of the Court, and the combined total compensation and expense reimbursement to be paid to the Receiver and Retained Personnel shall not exceed 30% of the net value of the Receivership Property.

*Id.* at ¶ 59.

3. On September 21, 2021, the Court entered an Order authorizing the Receiver to employ Stretto, Inc. (“Stretto”) as consultants for the Receivership estate.

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<sup>1</sup> On September 10, 2021, the Court entered its *Order Amending Order Appointing Receiver to Correct Typographical Errors*. (Doc. No. 53).

4. Attached hereto as **Exhibit B** is documentation itemizing the fees and expenses incurred by Stretto in connection with its engagement by the Receiver during the Application Period. Stretto has applied a 30% discount to its professional fees as indicated on the invoices included in Ex. B.

5. The Receiver contends that Stretto has spent the following time in performing the services referred to herein as consultants for the Receiver, and she is informed and believes that Stretto's services rendered as consultants for the Receiver are reasonably worth the sum as set forth below and that Stretto should be allowed and paid said sum as fees and as a cost of this estate:

<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Analyst I	0.4	\$36	\$14.40
Analyst II	0.2	\$54	\$10.80
Analyst III	1.5	\$72	\$108.00
Specialized Associate	24.6	\$302	\$7,429.20
Specialized Director	3.2	\$379	\$1,212.80
Specialized Managing Director	6.5	\$434	\$2,821.00
Specialized Senior Associate	27.8	\$357	\$9,924.60
Total:			\$21,520.80
Discount			(\$6,456.24)
Total Fees			<b>\$15,064.56</b>
Expenses			\$12,901.15
<b>Total Fees &amp; Expenses:</b>			<b>\$27,965.71</b>

6. The Receiver respectfully submits that the services for which Stretto seeks compensation were necessary for, and beneficial to, the orderly

administration of the Receivership Estate.

WHEREFORE, the Receiver prays that the Court will enter an Order allowing compensation of **\$15,064.56** and reimbursement of expenses of **\$12,901.15** to Stretto as consultants for the Receiver; authorizing the payment of any allowed fees and expenses from the funds of the Receivership estate in accordance with the SEC Guidelines and Billing Instructions; and granting such further relief as is just and proper.

Dated this 19<sup>th</sup> day of October, 2022.

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

521 E. Morehead St., Ste. 440

Charlotte, NC 28202

Phone: 704.375.3720

Fax: 704.332.0215

[cwright@grierlaw.com](mailto:cwright@grierlaw.com)

*Attorneys for the Receiver*

/s/ W. Russell Patterson, Jr.

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229 Peachtree St., NE, Suite 2400

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(404) 588-0500

[wrpjr@rbspgr.com](mailto:wrpjr@rbspgr.com)

*Attorneys for the Receiver*

Exhibit A – Summary of Prior Fee Applications

Exhibit B – Stretto's Invoices for Application Period

Exhibit C – Receiver's Certification

**EXHIBIT A**  
Summary of Prior Fee Applications

<b>Document</b>	<b>Interim Fee Application Date and Doc. No.</b>	<b>Period Covered</b>	<b>Fees Requested/Allowed</b>	<b>Expenses Requested/Allowed</b>	<b>Order Approving Interim Application</b>
1 <sup>st</sup> Interim	11/03/2021 Doc. No. 94	9/1/2021 – 9/30/2021	\$5,766.50	\$711.66	Doc. No. 102 12/2/2021
2 <sup>nd</sup> Interim	1/20/2022 Doc. No. 135	10/1/2021- 12/31/2021	\$17,809.85	\$3,006.73	Doc. No. 154 2/14/2022
3 <sup>rd</sup> Interim	4/22/2022 Doc. No. 193	1/1/2022- 3/31/2022	\$9,080.33	\$10,522.93	Doc. No. 210 5/13/2022
4 <sup>th</sup> Interim	7/25/2022 Doc. No. 246	4/1/2022- 6/30/2022	\$12,417.93	\$12,540.90	Doc. No. 270 8/18/2022



Exhibit B

**Case Name:** Horizon Receivership

**Case No:** 21-03413

## Summary of Hourly Fees

**Date Range:** 07/01/2022 - 07/31/2022

Role	Hours	Rate	Total
Analyst III	0.2	\$72.00	\$14.40
Specialized Associate	10.8	\$302.00	\$3,261.60
Specialized Director	1.3	\$379.00	\$492.70
Specialized Managing Director	3.1	\$434.00	\$1,345.40
Specialized Senior Associate	10.0	\$357.00	\$3,570.00
		<b>Total</b>	<b>\$8,684.10</b>

Exhibit B

**Stretto, Inc.**

410 Exchange, Ste 100

Irvine, CA 92602

800.634.7734

StrettoCR-Billing@stretto.com

**Invoice 7041****BILL TO**

Horizon Receivership

**DATE**  
 07/31/2022

**PLEASE PAY**  
**\$36,325.23**
**DUE DATE**  
 08/30/2022

DATE	ACCOUNT SUMMARY	AMOUNT
06/30/2022	Balance Forward	24,958.83
	Other payments and credits after 06/30/2022 through 07/30/2022	0.00
07/31/2022	Other invoices from this date	0.00
	New charges (details below)	11,366.40
	<b>Total Amount Due</b>	<b>36,325.23</b>

DESCRIPTION	QTY	RATE	AMOUNT
Hourly Fees			8,684.10
Client Discount			-2,605.23
Printing	11,771	0.11	1,294.81
Postage			536.76
Envelopes and Packaging – See Noticing Summary for details			44.70
Electronic Imaging	351	0.11	38.61
License Fee and System Maintenance	494	0.11	54.34
Robotic Process Automation - Includes ECF docket automation, subscription-based docket notifications, USPS bulk mail operations, address validation, e-filing transactions, cloud computing charges, and related activities			1,546.50
Monthly HTTPS Usage - Bandwidth related to secure, bidirectional encryption of web-based documents and telephony			656.83
Secure Digital File Retention - FedRamp compliant storage of case records, documents and related files based on volume			1,114.98

For wire/ACH payments:

Bank Name – Pacific Western Bank

Bank Address – 110 West A Street, Suite 100, San Diego, CA 92101

Account No – 1000681781

ABA - 122238200

Beneficiary - Stretto

Remit Check Payments to:

Stretto: Attn Accounts Receivable

410 Exchange, Ste. 100

Irvine, CA 92602



Exhibit B

TOTAL OF NEW CHARGES

11,366.40

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TOTAL DUE

**\$36,325.23**

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THANK YOU.

For wire/ACH payments:

Bank Name – Pacific Western Bank

Bank Address – 110 West A Street, Suite 100, San Diego, CA 92101

Account No – 1000681781

ABA - 122238200

Beneficiary - Stretto

Remit Check Payments to:

Stretto: Attn Accounts Receivable

410 Exchange, Ste. 100

Irvine, CA 92602

Exhibit B**Case Name:** Horizon Receivership**Case No:** 21-03413**Time Detail****Date Range:** 07/01/2022 - 07/31/2022

<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
07/01/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
07/01/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various creditors	0.6
<b>Subtotal 07/01/2022</b>					<b>0.8</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
07/05/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
07/05/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: case update	0.1
<b>Subtotal 07/05/2022</b>					<b>0.3</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
07/06/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: claims letter	0.2
07/06/2022	Jeff Demma	Specialized Senior Associate	Case Management	Prepare creditor matrix list for counsel	0.4
<b>Subtotal 07/06/2022</b>					<b>0.6</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
07/07/2022	Melissa Membrino	Specialized Director	Noticing	Administrative review of mailing details	0.2
<b>Subtotal 07/07/2022</b>					<b>0.2</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
07/08/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via phone re: claim forms	0.2
07/08/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.2
07/08/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.3

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
07/08/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.3
<b>Subtotal 07/08/2022</b>					<b>1.0</b>

Date	Employee Name	Role	Task	Description	Hours
07/11/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: name update	0.1
07/11/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
07/11/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates; standardize language re: same	0.1
<b>Subtotal 07/11/2022</b>					<b>0.3</b>

Date	Employee Name	Role	Task	Description	Hours
07/12/2022	Alberto Chachagua	Specialized Associate	Noticing	Generate service of Receiver's Fourth Report (DN 238) mailing including printing and fulfillment	0.6
07/12/2022	Charles Wheeler	Specialized Associate	Noticing	Generate service of Receiver's Fourth Report (DN 238) mailing including printing and fulfillment	0.5
07/12/2022	Darnell Jones	Specialized Associate	Noticing	Generate service of Receiver's Fourth Report (DN 238) mailing including printing and fulfillment	0.8
07/12/2022	David Bribiesca	Specialized Associate	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
07/12/2022	David Bribiesca	Specialized Associate	Noticing	Generate service of Receiver's Fourth Report (DN 238) mailing including printing and fulfillment	0.8
07/12/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (3) via email re: mailings	0.3
07/12/2022	Jeff Demma	Specialized Senior Associate	Website Updates and Maintenance	Add key dates to case website	0.2
07/12/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: Notice to Investors regarding claims notice per C. Wright	0.8
07/12/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various investors	0.8
07/12/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket no. 238 per B. Franklin	0.7
07/12/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update creditor mailing matrix per B. Franklin	1.4
07/12/2022	Laura Tondreault	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
07/12/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of Receiver's Fourth Report (DN 238) mailing including printing and fulfillment	0.4
07/12/2022	Monica Arellano	Analyst	Undeliverable Mail	Review undeliverable mail images for accuracy and completeness	0.1
07/12/2022	Naomi Rodriguez	Specialized Associate	Noticing	Generate service of Receiver's Fourth Report (DN 238) mailing including printing and fulfillment	0.1
07/12/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case related correspondence and activity; check in with case team	0.4

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
07/12/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of Receiver's Fourth Report (DN 238) mailing	0.4
<b>Subtotal 07/12/2022</b>					<b>8.5</b>
Date	Employee Name	Role	Task	Description	Hours
07/13/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
07/13/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (2) via email re: claim notice	0.2
07/13/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.3
<b>Subtotal 07/13/2022</b>					<b>0.7</b>
Date	Employee Name	Role	Task	Description	Hours
07/14/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: claims notice	0.1
<b>Subtotal 07/14/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
07/15/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates; standardize language re: same	0.1
07/15/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.3
07/15/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.3
<b>Subtotal 07/15/2022</b>					<b>0.7</b>
Date	Employee Name	Role	Task	Description	Hours
07/18/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
07/18/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
07/18/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 07/18/2022</b>					<b>0.4</b>
Date	Employee Name	Role	Task	Description	Hours
07/19/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.4
<b>Subtotal 07/19/2022</b>					<b>0.4</b>

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
07/20/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: Sale process	0.1
<b>Subtotal 07/20/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
07/21/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via phone re: claim letter	0.2
<b>Subtotal 07/21/2022</b>					<b>0.2</b>
Date	Employee Name	Role	Task	Description	Hours
07/23/2022	Jose Cruz	Specialized Associate	Noticing	Administrative review of mailing details	0.1
<b>Subtotal 07/23/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
07/25/2022	Alberto Chachagua	Specialized Associate	Noticing	Generate service of Notice of Fourth Applications for Compensation (DN 248) mailing including printing and fulfillment	0.5
07/25/2022	Charles Wheeler	Specialized Associate	Noticing	Generate service of Notice of Fourth Applications for Compensation (DN 248) mailing including printing and fulfillment	0.1
07/25/2022	David Bribiesca	Specialized Associate	Noticing	Generate service of Notice of Fourth Applications for Compensation (DN 248) mailing including printing and fulfillment	0.5
07/25/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: claims document	0.1
07/25/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.4
07/25/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket no. 248 per B. Franklin	0.7
07/25/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of Notice of Fourth Applications for Compensation (DN 248) mailing including printing and fulfillment	0.4
07/25/2022	Naomi Rodriguez	Specialized Associate	Noticing	Generate service of Notice of Fourth Applications for Compensation (DN 248) mailing including printing and fulfillment	0.1
07/25/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case related correspondence and activity; check in with case team	0.3
07/25/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.2
07/25/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.2
07/25/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of Notice of Fourth Applications for Compensation (DN 248) mailing	0.3
<b>Subtotal 07/25/2022</b>					<b>3.8</b>

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
07/26/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.5
07/26/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
07/26/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 07/26/2022</b>					<b>0.7</b>
Date	Employee Name	Role	Task	Description	Hours
07/27/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
07/27/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 07/27/2022</b>					<b>0.2</b>
Date	Employee Name	Role	Task	Description	Hours
07/28/2022	Alberto Chachagua	Specialized Associate	Noticing	Generate service of for Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253) mailing including printing and fulfillment	0.6
07/28/2022	Charles Wheeler	Specialized Associate	Noticing	Generate service of for Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253) mailing including printing and fulfillment	0.6
07/28/2022	Darnell Jones	Specialized Associate	Noticing	Generate service of for Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253) mailing including printing and fulfillment	0.6
07/28/2022	David Bribiesca	Specialized Associate	Noticing	Generate service of For Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253) mailing including printing and fulfillment	1.0
07/28/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket nos. 251 & 253 per B. Franklin	0.7
07/28/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various creditors	0.5
07/28/2022	Jose Cruz	Specialized Associate	Noticing	Generate service of Enjoy Technology, Inc. NOL Motion - Nominees mailing including printing and fulfillment	0.3
07/28/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of for Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253) mailing including printing and fulfillment	0.3
07/28/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
07/28/2022	Naomi Rodriguez	Specialized Associate	Noticing	Generate service of for Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253) mailing including printing and fulfillment	0.2
07/28/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case related correspondence and activity; check in with case team	0.4

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
07/28/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.2
07/28/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.2
07/28/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of for Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253) mailing	0.3
<b>Subtotal 07/28/2022</b>					<b>6.0</b>
Date	Employee Name	Role	Task	Description	Hours
07/29/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
07/29/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
<b>Subtotal 07/29/2022</b>					<b>0.3</b>
<b>Total 07/01/2022 - 07/31/2022</b>					<b>25.4</b>

Exhibit B**Noticing Detail**

<b>Date of Service</b>	<b>Document(s) or Mailing Description</b>	<b>Number of Recipients</b>	<b>Method(s) of Service</b>
7/12/2022	Receiver's Fourth Report (DN 238)	100	First Class Mail
7/25/2022	Notice of Fourth Applications for Compensation (DN 248)	99	First Class Mail
7/28/2022	for Authority to Pay Certain Post-Sale Expenses of Southport Capital (DN 251); Motion for Order Regarding Distribution Method and Procedure for Distributions on Investor Claims (DN 253)	99	First Class Mail



Exhibit B**Case Name:** Horizon Receivership**Case No:** 21-03413**Summary of Hourly Fees****Date Range:** 08/01/2022 - 08/31/2022

<b>Role</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Analyst I	0.1	\$36.00	\$3.60
Analyst II	0.2	\$54.00	\$10.80
Analyst III	0.4	\$72.00	\$28.80
Specialized Associate	6.1	\$302.00	\$1,842.20
Specialized Director	0.5	\$379.00	\$189.50
Specialized Managing Director	0.9	\$434.00	\$390.60
Specialized Senior Associate	10.0	\$357.00	\$3,570.00
		<b>Total</b>	<b>\$6,035.50</b>

Exhibit B

**Stretto, Inc.**

410 Exchange, Ste 100

Irvine, CA 92602

800.634.7734

StrettoCR-Billing@stretto.com

**Invoice 7154****BILL TO**

Horizon Receivership

**DATE**  
 08/31/2022

**PLEASE PAY**  
**\$43,897.07**
**DUE DATE**  
 09/30/2022

DATE	ACCOUNT SUMMARY	AMOUNT
07/31/2022	Balance Forward	36,325.23
	Other payments and credits after 07/31/2022 through 08/30/2022	0.00
08/31/2022	Other invoices from this date	0.00
	New charges (details below)	7,571.84
	<b>Total Amount Due</b>	<b>43,897.07</b>

DESCRIPTION	QTY	RATE	AMOUNT
Hourly Fees			6,035.50
Client Discount			-1,810.65
Printing	3,724	0.11	409.64
Postage			246.96
Envelopes and Packaging – See Noticing Summary for details			29.40
Electronic Imaging	260	0.11	28.60
License Fee and System Maintenance	494	0.11	54.34
Robotic Process Automation - Includes ECF docket automation, subscription-based docket notifications, USPS bulk mail operations, address validation, e-filing transactions, cloud computing charges, and related activities			1,151.45
Monthly HTTPS Usage - Bandwidth related to secure, bidirectional encryption of web-based documents and telephony			252.57
Secure Digital File Retention - FedRamp compliant storage of case records, documents and related files based on volume			1,174.03

For wire/ACH payments:

Bank Name – Pacific Western Bank

Bank Address – 110 West A Street, Suite 100, San Diego, CA 92101

Account No – 1000681781

ABA - 122238200

Beneficiary - Stretto

Remit Check Payments to:

Stretto: Attn Accounts Receivable

410 Exchange, Ste. 100

Irvine, CA 92602

Exhibit B

TOTAL OF NEW CHARGES

7,571.84

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TOTAL DUE

**\$43,897.07**

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THANK YOU.

For wire/ACH payments:

Bank Name – Pacific Western Bank

Bank Address – 110 West A Street, Suite 100, San Diego, CA 92101

Account No – 1000681781

ABA - 122238200

Beneficiary - Stretto

Remit Check Payments to:

Stretto: Attn Accounts Receivable

410 Exchange, Ste. 100

Irvine, CA 92602

Exhibit B**Case Name:** Horizon Receivership**Case No:** 21-03413**Time Detail****Date Range:** 08/01/2022 - 08/31/2022

<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
08/01/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various creditors	0.2
08/01/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
08/01/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 08/01/2022</b>					<b>0.4</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
08/02/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
08/02/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
08/02/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 08/02/2022</b>					<b>0.3</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
08/03/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.3
08/03/2022	Melissa Membrino	Specialized Director	Noticing	Administrative review of mailing details	0.2
<b>Subtotal 08/03/2022</b>					<b>0.5</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
08/04/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.4
08/04/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates; standardize language re: same	0.1
<b>Subtotal 08/04/2022</b>					<b>0.5</b>
<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
08/05/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.4
<b>Subtotal 08/05/2022</b>					<b>0.4</b>

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
08/06/2022	Jose Cruz	Specialized Associate	Noticing	Administrative review of mailing details	0.2
<b>Subtotal 08/06/2022</b>					<b>0.2</b>
Date	Employee Name	Role	Task	Description	Hours
08/08/2022	Abigail Nolasco	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
08/08/2022	David Bribiesca	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
08/08/2022	Keny Contreras	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
08/08/2022	Laura Tondreault	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 08/08/2022</b>					<b>0.4</b>
Date	Employee Name	Role	Task	Description	Hours
08/09/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates; standardize language re: same	0.1
<b>Subtotal 08/09/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
08/12/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.3
08/12/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates; standardize language re: same	0.1
<b>Subtotal 08/12/2022</b>					<b>0.4</b>
Date	Employee Name	Role	Task	Description	Hours
08/16/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.6
08/16/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: address update	0.1
08/16/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
08/16/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 08/16/2022</b>					<b>0.9</b>
Date	Employee Name	Role	Task	Description	Hours
08/17/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.6
08/17/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
08/17/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 08/17/2022</b>					<b>0.8</b>

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
08/18/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.7
<b>Subtotal 08/18/2022</b>					<b>0.7</b>

Date	Employee Name	Role	Task	Description	Hours
08/19/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various investors	0.4
08/19/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.2
08/19/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.3
<b>Subtotal 08/19/2022</b>					<b>0.9</b>

Date	Employee Name	Role	Task	Description	Hours
08/22/2022	Alberto Chachagua	Specialized Associate	Noticing	Generate service of Notice of Hearing on Distribution Motion (DN 276) mailing including printing and fulfillment	0.5
08/22/2022	Darnell Jones	Specialized Associate	Noticing	Generate service of Notice of Hearing on Distribution Motion (DN 276) mailing including printing and fulfillment	0.2
08/22/2022	David Bribiesca	Specialized Associate	Noticing	Generate service of Notice of Hearing on Distribution Motion (DN 276) mailing including printing and fulfillment	0.8
08/22/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.6
08/22/2022	Jeff Demma	Specialized Senior Associate	Website Updates and Maintenance	Update case website	0.6
08/22/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket no. 276 per B. Franklin	0.8
08/22/2022	Jose Cruz	Specialized Associate	Noticing	Generate service of Notice of Hearing on Distribution Motion (DN 276) mailing including printing and fulfillment	0.3
08/22/2022	Naomi Rodriguez	Specialized Associate	Noticing	Generate service of Notice of Hearing on Distribution Motion (DN 276) mailing including printing and fulfillment	0.1
08/22/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
08/22/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of Notice of Hearing on Distribution Motion (DN 276) mailing	0.3
<b>Subtotal 08/22/2022</b>					<b>4.4</b>

Date	Employee Name	Role	Task	Description	Hours
08/23/2022	Jeff Demma	Specialized Senior Associate	Website Updates and Maintenance	Update case website with notice of hearing	0.8
08/23/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: notice of hearing	0.1
<b>Subtotal 08/23/2022</b>					<b>0.9</b>

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
08/24/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.3
08/24/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (2) via email re: service list	0.2
<b>Subtotal 08/24/2022</b>					<b>0.5</b>
Date	Employee Name	Role	Task	Description	Hours
08/25/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via email re: service	0.1
<b>Subtotal 08/25/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
08/26/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
<b>Subtotal 08/26/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
08/29/2022	Abigail Nolasco	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
08/29/2022	David Bribiesca	Specialized Associate	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
08/29/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various creditors per C. Wright	0.5
08/29/2022	Keny Contreras	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
08/29/2022	Laura Tondreault	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
<b>Subtotal 08/29/2022</b>					<b>0.9</b>
Date	Employee Name	Role	Task	Description	Hours
08/30/2022	Jeff Demma	Specialized Senior Associate	Noticing	Prepare creditor matrix for counsel	0.4
08/30/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for certain investors	0.5
08/30/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.3
08/30/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.3
<b>Subtotal 08/30/2022</b>					<b>1.5</b>
Date	Employee Name	Role	Task	Description	Hours
08/31/2022	Brenna Dooley	Specialized Associate	Noticing	Generate service of US Sampleworks Motion (DN 283) mailing including printing and fulfillment	0.5
08/31/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.4
08/31/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket no. 283 per B. Franklin	0.7

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
08/31/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of US Sampleworks Motion (DN 283) mailing including printing and fulfillment	0.3
08/31/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.1
08/31/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
08/31/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
08/31/2022	Shelby Mahoney	Specialized Associate	Noticing	Generate service of US Sampleworks Motion (DN 283) mailing including printing and fulfillment	0.8
08/31/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of US Sampleworks Motion (DN 283) mailing	0.3
<b>Subtotal 08/31/2022</b>					<b>3.3</b>
<b>Total 08/01/2022 - 08/31/2022</b>					<b>18.2</b>



Exhibit B



**Noticing Detail**

<b>Date of Service</b>	<b>Document(s) or Mailing Description</b>	<b>Number of Recipients</b>	<b>Method(s) of Service</b>
8/22/2022	Notice of Hearing on Distribution Motion (DN 276)	98	First Class Mail
8/31/2022	US Sampleworks Motion (DN 283)	98	First Class Mail



Exhibit B

**Case Name:** Horizon Receivership

**Case No:** 21-03413

## Summary of Hourly Fees

**Date Range:** 09/01/2022 - 09/30/2022

Role	Hours	Rate	Total
Analyst I	0.3	\$36.00	\$10.80
Analyst III	0.9	\$72.00	\$64.80
Specialized Associate	7.7	\$302.00	\$2,325.40
Specialized Director	1.4	\$379.00	\$530.60
Specialized Managing Director	2.5	\$434.00	\$1,085.00
Specialized Senior Associate	7.8	\$357.00	\$2,784.60
		<b>Total</b>	<b>\$6,801.20</b>

Exhibit B

**Stretto, Inc.**

410 Exchange, Ste 100

Irvine, CA 92602

800.634.7734

StrettoCR-Billing@stretto.com

**Invoice 7275****BILL TO**

Horizon Receivership

**DATE**  
 09/30/2022

**PLEASE PAY**  
**\$27,965.71**
**DUE DATE**  
 10/30/2022

DATE	ACCOUNT SUMMARY	AMOUNT
08/31/2022	Balance Forward	43,897.07
	Other payments and credits after 08/31/2022 through 09/29/2022	-24,958.83
09/30/2022	Other invoices from this date	0.00
	New charges (details below)	9,027.47
	Total Amount Due	27,965.71

DESCRIPTION	QTY	RATE	AMOUNT
Hourly Fees			6,801.20
Client Discount			-2,040.36
Printing	3,823	0.11	420.53
Postage			282.84
Envelopes and Packaging – See Noticing Summary for details			44.25
Electronic Imaging	207	0.11	22.77
License Fee and System Maintenance	494	0.11	54.34
Robotic Process Automation - Includes ECF docket automation, subscription-based docket notifications, USPS bulk mail operations, address validation, e-filing transactions, cloud computing charges, and related activities			1,546.45
Monthly HTTPS Usage - Bandwidth related to secure, bidirectional encryption of web-based documents and telephony			660.12
Secure Digital File Retention - FedRamp compliant storage of case records, documents and related files based on volume			1,235.33

For wire/ACH payments:

Bank Name – Pacific Western Bank

Bank Address – 110 West A Street, Suite 100, San Diego, CA 92101

Account No – 1000681781

ABA - 122238200

Beneficiary - Stretto

Remit Check Payments to:

Stretto: Attn Accounts Receivable

410 Exchange, Ste. 100

Irvine, CA 92602

Exhibit B

TOTAL OF NEW CHARGES

9,027.47

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TOTAL DUE

**\$27,965.71**

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THANK YOU.

For wire/ACH payments:

Bank Name – Pacific Western Bank  
Bank Address – 110 West A Street, Suite 100, San Diego, CA 92101  
Account No – 1000681781  
ABA - 122238200  
Beneficiary - Stretto

Remit Check Payments to:

Stretto: Attn Accounts Receivable  
410 Exchange, Ste. 100  
Irvine, CA 92602

Exhibit B**Case Name:** Horizon Receivership**Case No:** 21-03413**Time Detail****Date Range:** 09/01/2022 - 09/30/2022

Date	Employee Name	Role	Task	Description	Hours
09/02/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
09/02/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.6
<b>Subtotal 09/02/2022</b>					<b>0.8</b>

Date	Employee Name	Role	Task	Description	Hours
09/06/2022	David Bribiesca	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
09/06/2022	Jeff Demma	Specialized Senior Associate	Noticing	Prepare list of residents for Receiver	0.7
09/06/2022	Keny Contreras	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.2
09/06/2022	Laura Tondreault	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
09/06/2022	Roman Meleshko	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
09/06/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
09/06/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 09/06/2022</b>					<b>1.4</b>

Date	Employee Name	Role	Task	Description	Hours
09/07/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various investors	0.4
09/07/2022	Melissa Membrino	Specialized Director	Noticing	Administrative review of mailing details	0.2
<b>Subtotal 09/07/2022</b>					<b>0.6</b>

Date	Employee Name	Role	Task	Description	Hours
09/08/2022	Alberto Chachagua	Specialized Associate	Noticing	Generate service of Notice of Receiver's Motion for Allowance of and Distribution on Class 5 Claims Against Southport Capital (Docket No. 287-4); Notice of Receiver's Motion for Disallowance of Certain Investor Claims (Docket No. 288-5) mailing including printing and fulfillment	0.5
09/08/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2

**Exhibit B**

<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
09/08/2022	David Bribiesca	Specialized Associate	Noticing	Generate service of Notice of Receiver's Motion for Allowance of and Distribution on Class 5 Claims Against Southport Capital (Docket No. 287-4); Notice of Receiver's Motion for Disallowance of Certain Investor Claims (Docket No. 288-5) mailing including printing and fulfillment	0.6
09/08/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.3
09/08/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket nos. 287-4 & 288-5 per B. Franklin	0.8
09/08/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of Notice of Receiver's Motion for Allowance of and Distribution on Class 5 Claims Against Southport Capital (Docket No. 287-4); Notice of Receiver's Motion for Disallowance of Certain Investor Claims (Docket No. 288-5) mailing including printing and fulfillment	0.3
09/08/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of Notice of Receiver's Motion for Allowance of and Distribution on Class 5 Claims Against Southport Capital (Docket No. 287-4); Notice of Receiver's Motion for Disallowance of Certain Investor Claims (Docket No. 288-5) mailing including printing and fulfillment	0.3
09/08/2022	Naomi Rodriguez	Specialized Associate	Noticing	Generate service of Notice of Receiver's Motion for Allowance of and Distribution on Class 5 Claims Against Southport Capital (Docket No. 287-4); Notice of Receiver's Motion for Disallowance of Certain Investor Claims (Docket No. 288-5) mailing including printing and fulfillment	0.2
09/08/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
09/08/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.3
09/08/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.3
09/08/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of Notice of Receiver's Motion for Allowance of and Distribution on Class 5 Claims Against Southport Capital (Docket No. 287-4); Notice of Receiver's Motion for Disallowance of Certain Investor Claims (Docket No. 288-5) mailing	0.3
<b>Subtotal 09/08/2022</b>					<b>4.3</b>

<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
09/09/2022	Jeff Demma	Specialized Senior Associate	Creditor Correspondence	Respond to creditor inquiry (1) via phone re: filing a claim	0.2
<b>Subtotal 09/09/2022</b>					<b>0.2</b>

<b>Date</b>	<b>Employee Name</b>	<b>Role</b>	<b>Task</b>	<b>Description</b>	<b>Hours</b>
09/12/2022	Jeff Demma	Specialized Senior Associate	Case Management	Respond to counsel re: email distribution list	0.2
09/12/2022	Roman Meleshko	Analyst	Undeliverable Mail	Sort and manage incoming mail re: various mailings	0.1
09/12/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.2

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
09/12/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.2
<b>Subtotal 09/12/2022</b>					<b>0.7</b>

Date	Employee Name	Role	Task	Description	Hours
09/13/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
09/13/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various creditors	0.4
09/13/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
<b>Subtotal 09/13/2022</b>					<b>0.7</b>

Date	Employee Name	Role	Task	Description	Hours
09/14/2022	Alberto Chachagua	Specialized Associate	Noticing	Generate service of Order granting distribution method (DN 292) mailing including printing and fulfillment	0.6
09/14/2022	Darnell Jones	Specialized Associate	Noticing	Generate service of Order granting distribution method (DN 292) mailing including printing and fulfillment	0.3
09/14/2022	David Bribiesca	Specialized Associate	Noticing	Generate service of Order granting distribution method (DN 292) mailing including printing and fulfillment	0.6
09/14/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket no. 292 per C. Wright	0.7
09/14/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of Order granting distribution method (DN 292) mailing including printing and fulfillment	0.3
09/14/2022	Naomi Rodriguez	Specialized Associate	Noticing	Generate service of Order granting distribution method (DN 292) mailing including printing and fulfillment	0.1
09/14/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
09/14/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Review court docket and monitor case activity for updates; standardize language re: same	0.2
09/14/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
09/14/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
09/14/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of Order granting distribution method (DN 292) mailing	0.3
<b>Subtotal 09/14/2022</b>					<b>3.5</b>

Date	Employee Name	Role	Task	Description	Hours
09/16/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.7
<b>Subtotal 09/16/2022</b>					<b>0.7</b>

Exhibit B

Date	Employee Name	Role	Task	Description	Hours
09/19/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
<b>Subtotal 09/19/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
09/20/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
09/20/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 09/20/2022</b>					<b>0.2</b>
Date	Employee Name	Role	Task	Description	Hours
09/22/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
09/22/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various parties	0.6
<b>Subtotal 09/22/2022</b>					<b>0.8</b>
Date	Employee Name	Role	Task	Description	Hours
09/23/2022	Naomi Rodriguez	Specialized Associate	Noticing	Administrative review of mailing details	0.1
<b>Subtotal 09/23/2022</b>					<b>0.1</b>
Date	Employee Name	Role	Task	Description	Hours
09/26/2022	Jeff Demma	Specialized Senior Associate	Website Updates and Maintenance	Administrative review of court docket; standardize language re: same	0.2
<b>Subtotal 09/26/2022</b>					<b>0.2</b>
Date	Employee Name	Role	Task	Description	Hours
09/27/2022	Anthony Facciano	Specialized Managing Director	Case Management	General Case management, and communication with the team RE: the same	0.2
09/27/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Download filed pleadings from court docket and update public website re: same	0.1
09/27/2022	Serina Tran	Specialized Associate	Document Processing	Administrative review of court docket for actionable pleadings; attention to same	0.1
<b>Subtotal 09/27/2022</b>					<b>0.4</b>
Date	Employee Name	Role	Task	Description	Hours
09/28/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various investors	0.6
09/28/2022	Monica Arellano	Analyst	Noticing	Coordinate service re: docket no. 276 per USPS forwarding instructions	0.2
<b>Subtotal 09/28/2022</b>					<b>0.8</b>



Exhibit B

Date	Employee Name	Role	Task	Description	Hours
09/29/2022	Alberto Chachagua	Specialized Associate	Noticing	Coordinate service re: Notice of Hearing on Distribution Motion 1 (Docket No. 276) per USPS forwarding instructions	0.1
09/29/2022	Jeff Demma	Specialized Senior Associate	Noticing	Update contact information for various investors	0.6
09/29/2022	Monica Arellano	Analyst	Noticing	Coordinate service re: docket no. 276 per USPS forwarding instructions	0.2
<b>Subtotal 09/29/2022</b>					<b>0.9</b>
Date	Employee Name	Role	Task	Description	Hours
09/30/2022	Alberto Chachagua	Specialized Associate	Noticing	Generate service of Motion to Provide Contact Information (DN 299) mailing including printing and fulfillment	0.6
09/30/2022	Darnell Jones	Specialized Associate	Noticing	Generate service of Motion to Provide Contact Information (DN 299) mailing including printing and fulfillment	0.7
09/30/2022	David Bribiesca	Specialized Associate	Noticing	Generate service of Motion to Provide Contact Information (DN 299) mailing including printing and fulfillment	0.8
09/30/2022	Jeff Demma	Specialized Senior Associate	Noticing	Coordinate service re: docket no. 299 per B. Franklin	0.8
09/30/2022	Jose Cruz	Specialized Associate	Noticing	Generate service of Motion to Provide Contact Information (DN 299) mailing including printing and fulfillment	0.2
09/30/2022	Melissa Membrino	Specialized Director	Noticing	Coordinate service of Motion to Provide Contact Information (DN 299) mailing including printing and fulfillment	0.3
09/30/2022	Monica Arellano	Analyst	Noticing	Coordinate service re: docket nos. 287-4 & 288-5 per USPS forwarding instructions	0.2
09/30/2022	Robert Klamser	Specialized Managing Director	Case Management	Senior management oversight of case activity including team correspondence, filed documents and client requests; check-in with case team	0.2
09/30/2022	Serina Tran	Specialized Associate	Website Updates and Maintenance	Administrative review of court docket; standardize language re: same	0.1
09/30/2022	Sheryl Betance	Specialized Managing Director	Noticing	Facilitate service of Motion to Provide Contact Information (DN 299) mailing	0.3
<b>Subtotal 09/30/2022</b>					<b>4.2</b>
<b>Total 09/01/2022 - 09/30/2022</b>					<b>20.6</b>

Exhibit B**Noticing Detail**

<b>Date of Service</b>	<b>Document(s) or Mailing Description</b>	<b>Number of Recipients</b>	<b>Method(s) of Service</b>
9/8/2022	Notice of Receiver's Motion for Allowance of and Distribution on Class 5 Claims Against Southport Capital (Docket No. 287-4); Notice of Receiver's Motion for Disallowance of Certain Investor Claims (Docket No. 288-5)	98	First Class Mail
9/14/2022	Order granting distribution method (DN 292)	98	First Class Mail
9/29/2022	Notice of Hearing on Distribution Motion 1 (Docker No. 276)	1	First Class Mail
9/30/2022	Motion to Provide Contact Information (DN 299)	98	First Class Mail

## **EXHIBIT C**

### **Receiver's Certification**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**JOHN J. WOODS, ET AL.,**

**Defendants,**

Civil Action No.  
1:21-cv-3413-SDG

**RECEIVER'S CERTIFICATION IN SUPPORT OF FIFTH APPLICATION  
FOR COMPENSATION TO  
STRETTO, INC., CONSULTANTS FOR THE RECEIVER**

A. Cotten Wright, the Receiver for the estates of the Receivership Defendants herein, hereby certifies as follows with respect to the *Fifth Application for Compensation to Stretto, Inc., Consultants for the Receiver* and the invoice attached thereto as Exhibit B:

1. This Certification is made in compliance with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the "SEC Guidelines").

2. I am an attorney licensed to practice law in the State of North Carolina and the United States District Court for the Western District of North Carolina. I am a member of the law firm of Grier Wright Martinez, PA ("GWM").

3. I have read and am familiar with Stretto's application for compensation and reimbursement of expenses for the period of July 1, 2022 through September 30, 2022 (the "Application"). To the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses set forth therein are true and accurate and comply with the SEC Guidelines.

4. All fees contained in the Application are based on the rates listed in the Stretto's fee schedule included in Exhibit B, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

5. Stretto has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay in any request for expense reimbursement.

6. In seeking reimbursement for a service which Stretto justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), Stretto requests reimbursement only for the amount billed to Stretto by the third-party vendor and paid by Stretto to such vendor.

7. Stretto does not seek payment for time spent preparing the Application or any documentation in support of the same.

This is the 19<sup>th</sup> day of October, 2022.

/s/ A. Cotten Wright  
A. Cotten Wright  
Receiver